

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DARREN CUFF,

Plaintiff,

vs.

TRANS STATES HOLDINGS, INC.,  
TRANS STATES AIRLINES, GOJET  
AIRLINES, and ED TROWBRIDGE.

Defendants.

Case No. 10-cv-01349

Assigned Judge: Judge Leinenweber

Magistrate: Judge Cole

**MOTION OF DEFENDANT TRANS STATES HOLDINGS, INC.  
TO DISMISS PLAINTIFF'S COMPLAINT PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 12(b)(2)**

COMES NOW Defendant Trans States Holdings, Inc. (hereafter "TSH"), by and through its undersigned counsel, and moves this Court to dismiss Defendant TSH from the above titled action for lack of personal jurisdiction as authorized by Rule 12(b)(2) of the Federal Rules of Civil Procedure. In support of its motion, TSH states as follows:

1. As fully set forth in TSH's contemporaneously filed Memorandum in Support, this Court lacks personal jurisdiction over TSH. TSH is a corporation organized under the laws of the State of Delaware with its principal place of business in the State of Missouri. Further, TSH does not conduct business within Illinois, does not advertise in Illinois, does not possess or own real property in Illinois, nor does it have any employees in Illinois.

WHEREFORE for the foregoing reasons Defendant Trans States Holdings requests that this Court find that it does not have personal jurisdiction over Defendant Trans States Holdings, Inc. and for this reason dismisses Defendant Trans States

Holdings, Inc. from the above titled action, and for such other further relief as this Court deems just and proper under the circumstances.

Dated: March 26, 2010

Respectfully Submitted,

*/s/ David J.A. Hayes, III*

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**CERTIFICATE OF ELECTRONIC SERVICE**  
*Darren Cuff v. Trans States Holdings, Inc., et al.*  
10-CV-01349

I hereby certify that on March 26, 2010, I electronically filed the foregoing **Motion to Dismiss**, with the Clerk of the Court for the Northern District of Illinois using the ECF System which will send notification to the following registered participants of the ECF System as listed on the Court's Notice of Filing: Alejandro Caffarelli and Bradley Manewith.

I also certify that I have sent a paper copy, via standard overnight delivery, to: Judge Leinenweber pursuant to Local Rule 5.2(f).

Dated: March 26, 2010

Respectfully Submitted,

*/s/: David J.A. Hayes, III*

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